

SCPPA South Carolina Pulp & Paper Association

700 South Kaminski Street, Georgetown, SC 29440

July 1, 2008

Thomas J. Flynn, III, Manager
Air Data Analysis and Support
Bureau of Air Quality
SCDHEC
2600 Bull Street
Columbia, SC 29201

AbitibiBowater
Inc.

Domtar

Re: Comments on Network Description and Ambient Air Network Monitoring Plan
Calendar Year 2009

International
Paper

Dear Mr. Flynn:

The South Carolina Pulp and Paper Association (SCPPA) appreciates the opportunity to provide you with our comments related to DHEC's draft Network Description and Ambient Air Network Monitoring Plan, Calendar Year 2009 (the "Plan"). SCPPA represents the seven major pulp and paper manufacturing facilities in South Carolina employing over 13,000 South Carolinians.

KapStone
Charleston
Kraft LLC

SCPPA wishes to compliment DHEC for establishing a new monitoring site near downtown Greenville. This was arguably the highest priority CY2008 Network Plan. We understand two lower priority new monitoring sites have also been established.

Sonoco

SCPPA has serious concerns about the apparent lack of progress to date on other major changes included in the CY2008 Plan. By our unofficial tally, only 3 of 22 major network changes (excluding discontinuation of monitors) have been implemented. We understand there are numerous reasons for the current pace but given the importance of a high quality ambient air monitoring network, SCPPA recommends that a **prioritized implementation plan** be established with target completion dates for all agreed-upon changes. We recommend a **monthly progress report** be developed and made available on DHEC's Laboratory Services web page.

Smurfit-Stone
Container
Corporation

We would also suggest that DHEC include specific language in the 2009 network plan, clarifying DHEC's intentions regarding the operation of Special Purpose Monitors (SPMs). Specifically, we would like confirmation of the Department's position (as stated verbally in numerous stakeholder meetings) that **SPMs are short-term monitors that will be operated for a maximum of no more than two years** at any one location. It is also important to clarify how existing SPMs have been operated in excess of 10 to 20 years at the same location, and the CY2009 Plan is recommending indefinite continued operation of these monitors in apparent contradiction with the stated policy.

SCPPA continues to be concerned that DHEC is locating monitors closer to sources than other states, producing data that "appears" to be worse than it is for South Carolina's air quality. This could (and almost has in two instances) resulted in very serious

Environmental concern with a cooperative effort.

consequences for the state in terms of non-attainment determinations, economic development opportunities, and unwarranted government and public concern. SCPPA's position is that federal guidance on monitor siting is clear and SC DHEC should adhere to the letter and intent of this guidance.

SCPPA also has concerns that monitors that failed to pass the DHEC/Stakeholder site evaluation survey conducted in 2007 continue to produce a data record that is unsuitable for comparison to the NAAQS. The improvements to these sites or establishment of replacement sites should be given DHEC's highest priority.

SCPPA takes the position that the annual evaluation of Network Monitoring Plans is difficult without an objective report on the overall status of Ambient Air Quality in South Carolina. Many other states issue such comprehensive reports¹. We suggest the Bureau of Air Quality publish such a report periodically explaining the results of air monitoring, status of compliance with air quality standards, and showing long-term trends and projected levels based on future expected emissions and mandated reductions. Only when the "big picture" is understood, can a monitoring plan be developed that best meets South Carolina's air quality needs.

With federal standards becoming more restrictive, SCPPA feels it is urgent that DHEC move as expeditiously as possible to make the agreed-upon changes and **begin building an air quality database using data from the new monitors at the earliest opportunity possible.**

If you have any questions, please feel free to call me at (843) 545-2290 or electronically at jacquelyn.taylor@ipaper.com.

Sincerely,



Jacquelyn B. Taylor
Chair, SC Pulp and Paper Association

cc: SCPPA Members

¹Georgia: <http://www.georgiaair.org/amp/report06.pdf>
North Carolina: <http://daq.state.nc.us/monitor/reports/2002-01.pdf>